



New Media Humanity Association, Inc
WYPW-FM

August 19, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW; Room TWD-204
Washington, DC 20554

Re: RM No. 11753
Comments in Support of LPFM Proposal

Dear Ms. Dortch:

New Media Humanity Association, Inc. ("New Media"), permittee of unbuilt Low Power FM Radio Station WYPW-LP at Brandon, Florida submits this letter in support of the rule making proposal submitted by the Low Power FM Advocacy Group regarding various improvements to the LPFM Radio Service. Although WYPW-LP is not yet on-air, the principals of New Media have broadcast operational experience and are unquestionably qualified to submit these comments

The Advocacy Group requests, among other things, that LPFM stations be allowed to air commercial announcements, and that LPFM stations should be afforded primary status from an engineering and legal standpoint so they are not bumped off-air due to technical modifications filed by full power FM radio stations. New Media believes that both of these ideas have merit and should be further explored by the FCC.

New Media would like to broadcast sponsorship announcements that regional and national agencies are able to secure, but some of these announcements contain verbiage that violates strict underwriting rules and policies. As the FCC is currently in the process of modernizing some of its rules for broadcasters – such as the contest rules – we believe the time has come for revising the underwriting rules and policies to permit enhanced underwriting and sponsorship spots. Perhaps one way to achieve this would be to place a time limit on the amount of enhanced underwriting and sponsorship announcements that may be broadcast per hour. Such a change would provide LPFM broadcasters with some financial relief while concomitantly ensuring that the commercial content of LPFM programming be very limited each hour.

New Media also believes that LPFM stations should be afforded more protection from being bumped off-air by full power FM radio stations that might modify their technical facilities since the construction and operation of LPFM broadcast stations does, in fact, require a significant expenditure of money, time and effort. Even if the FCC does not wish to provide LPFM broadcast stations with "primary status" a process can be implemented to afford LPFM stations special temporary authority to remain on their frequency with reduced power while such interference matters are investigated. And as part of this process, an LPFM broadcaster and a full power FM broadcaster should be able to agree to accept a certain amount of mutual interference.

We respectfully request that the FCC consider our suggestions.

Sincerely,



Endre Kovacs
President